
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Leda Dunn Wettre, U.S.M.J.
v.	:	
	:	Mag. No. 19-8089
	:	
DENNIS JONES, and	:	CRIMINAL COMPLAINT
TALIB BEEKS	:	
	:	


I, Javier Perez, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Task Force Officer with the United States Drug Enforcement Administration, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof:



Task Force Officer Javier Perez
U.S. Drug Enforcement Administration

Sworn to before me and subscribed in my presence,
May 8, 2019 in Newark, New Jersey

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

On or about May 7, 2019, in Bergen County, in the District of New Jersey and elsewhere, the defendants,

DENNIS JONES, and
TALIB BEEKS

did knowingly and intentionally conspire with each other and others to distribute and possess with intent to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

In violation of Title 21, United States Code, Section 846.

ATTACHMENT B

I, Javier Perez, am a Task Force Officer with the United States Drug Enforcement Administration ("DEA"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Law enforcement has been investigating a drug trafficking organization ("DTO") currently operating in the New Jersey, New York, Pennsylvania, and elsewhere. During the course of the investigation, the DEA learned that defendant DENNIS JONES ("JONES") acts as a distributor for the DTO and traffics in kilogram quantities of cocaine. During the course of this investigation, the DEA has learned that the DTO transports narcotics from New Jersey and New York to the area of Pittsburgh, Pennsylvania, for distribution.

2. On or about March 21, 2019, while conducting surveillance in Newark, New Jersey, law enforcement observed a member of the DTO and a co-conspirator of JONES (hereinafter, "CC-1") driving a white Mercedes Benz SUV (the "Mercedes"). Upon observing CC-1, law enforcement learned that the Mercedes contained a hidden compartment, known as a "trap," behind the front passenger seat for the purposes of concealing narcotics and narcotics proceeds.

3. Based on registration information, law enforcement learned that the Mercedes is registered to defendant TALIB BEEKS ("BEEKS").

4. As law enforcement conducted surveillance of CC-1, from in or around March 2019 through in or around April 2019, law enforcement observed CC-1 with JONES as it appeared they were preparing for and then returning from suspected narcotics trafficking activities. CC-1 was observed coming in and out of JONES's residence in Edgewater, New Jersey (the "Jones Residence").

5. For example, on or about March 29, 2019, surveillance footage from the complex containing the Jones Residence showed JONES carrying a translucent plastic shopping bag containing an unknown quantity of U.S. currency from the parking garage to the Jones Residence. Based on my training and experience, the U.S. currency JONES was carrying constituted proceeds from narcotics transactions.

6. Pursuant to a lawfully-obtained search warrant for the Mercedes executed on or about May 7, 2019, law enforcement recovered approximately 800 grams of a substance that later field-tested positive for the presence of cocaine inside the “trap” of the Mercedes.

7. Pursuant to a lawfully-obtained search warrant for the Jones Residence executed on or about May 7, 2019, law enforcement discovered a narcotics packaging and distribution facility. Although JONES and BEEKS both appeared to be residing in the Jones Residence, law enforcement observed little to no furniture in the common area, which is consistent with individuals operating a narcotics packaging and distribution facility.

8. While searching the Jones Residence on or about May 7, 2019, law enforcement discovered a key for a Volvo (the “Volvo”). Pursuant to a lawful search of the Volvo, law enforcement discovered approximately 7 kilograms of a substance that later field-tested positive for the presence of cocaine inside the Volvo.

9. Following the searches, law enforcement arrested JONES and BEEKS.